

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

PEARL KING, as parent and next best friend  
of M.K., a minor,

Plaintiffs,

v.

CHICAGO BOARD OF EDUCATION  
(a/k/a CHICAGO PUBLIC SCHOOLS,  
DISTRICT 299), JANE DOE EDUCATOR  
NO. 1, and JANE DOE EDUCATOR NO.2,

Defendants.

Case No.:

(Circuit Court of Cook County, Illinois,  
Civil Action No. 2023 L 7047

Consolidated with Nos.:

2023L 2616  
2023 L 6929  
2023 L 6932  
2023 L 7046  
2023 L 7061  
2023 L 7064  
2023 L 7065  
2023 L 7069  
2023 L 7077  
2023 L 7099  
2023 L 8164  
2023 L 8170  
2023 L 9145

**DEFENDANTS' NOTICE OF REMOVAL**

Defendants, CHICAGO BOARD OF EDUCATION (a/k/a CHICAGO PUBLIC SCHOOLS, DISTRICT 299), JANE DOE EDUCATOR NO. 1 and JANE DOE EDUCATOR NO. 2 (collectively "Defendants"), by and through their respective undersigned counsel and pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, file this Notice of Removal of this civil action from the Circuit Court of Cook County, Illinois, in which it is now pending, to the United States District Court for the Northern District of Illinois, Eastern Division. In support of this Notice of Removal, the Defendants respectfully state the following:

1. On May 12, 2025, Plaintiff PEARL KING, as parent and next best friend of M.K., a minor, (“Plaintiff”), filed an amended complaint against the Defendants in the Circuit Court of Cook County, Illinois, entitled with the above case caption, bearing case number: 2023 L 2616. A true and correct copy of Plaintiff’s Amended Complaint is attached hereto as **Exhibit A**.

2. The Defendants were served with a copy of Plaintiff’s Amended Complaint filed in this civil action on May 12, 2025.

3. In accordance with 28 U.S.C. § 1446(b)(1), this Notice of Removal was timely filed within 30 days of the date on which this case became removable. 28 U.S.C. § 1446(b)(1).

4. Venue is proper in this District under 28 U.S.C. § 1441(a) because the state court where Plaintiff brought this action is located within this District.

5. This civil action is removable to this Court pursuant to 28 U.S.C. § 1441(a) and this Court has original jurisdiction over the present action because the Plaintiff’s causes of action constitute federal questions arising under the laws of the United States. Specifically, Plaintiff maintains, *inter alia*, a discrimination claim under the Rehabilitation Act of 1973 (“RA”) pursuant to 29 U.S. §794 (Section 504) (Count 1), a discrimination claim under Title II of the American with Disabilities Act (“ADA”) pursuant to 42 U.S.C. § 12132, *et seq.* (Count II), and an equal protection claim under 42 U.S.C. § 1983 (Count III). (**Ex. A**).

6. True and correct copies of all state court pleadings in this action are attached as **Exhibit B**.

7. A true and correct copy of the state court docket in this action is attached as **Exhibit C**.

8. Plaintiff is represented by attorneys Melvin L. Brooks and Victor P. Henderson in this action.

9. Defendant Jane Doe Educator No. 1 is represented by Matthew Hurd of the law firm of Ancel Glink, P.C., and Defendants Chicago Board of Education (A/K/A Chicago Public Schools, District 299) and Jane Doe Educator No. 2 are represented by Ernest Mincy, Deputy General Counsel for Litigation for the Board of Education of the City of Chicago.

10. This Notice of Removal is filed to certify consent by all Defendants to the removal of this case as required by 28 U.S.C. § 1446(b)(2)(A).

11. On May 23, 2025, the Defendants filed with the Clerk of the Circuit Court of Cook County, Illinois, a Notice of Filing of this Notice of Removal.

12. The Defendants have provided written notice to Plaintiff by contemporaneously serving Plaintiff with this Notice of Removal.

13. By filing this Notice of Removal, the Defendants do not waive any defense(s) that may be available to them.

14. The Defendants note that there are 14 related cases in the Circuit Court (related case numbers are provided in the caption above) which were consolidated with the instant matter for purposes of discovery. Case number 2023 L 2616 is the lead case in the Circuit Court.

15. The Defendants have simultaneously filed notices of removal for all of the related cases. If removal is successful, the Defendants intend to file a motion to consolidate all related cases in the federal court.

WHEREFORE, for the reasons stated above, this action is removable to this Court pursuant to 28 U.S.C. §§ 1331, 1441, and 1446 under this Court's federal question jurisdiction.

Respectfully submitted,

JANE DOE EDUCATOR NO. 1

JANE DOE EDUCATOR NO. 2 and  
BOARD OF EDUCATION OF THE CITY

OF CHICAGO

By: /s/ Matthew A. Hurd

Matthew A. Hurd

Maulik Sharma

ANCEL GLINK, P.C.

140 South Dearborn Street, Sixth Floor

Chicago, Illinois 60603

(312) 782-7606 (Phone)

(312) 782-0943 (Fax)

[mhurd@ancelglink.com](mailto:mhurd@ancelglink.com)

By: /s/ J. Ernest Mincy

J. Ernest Mincy

Deputy General Counsel for Litigation

Board of Education of the City of Chicago

1 North Dearborn Street, Suite 900

Chicago, IL 60602

(773) 553-1693

[jemincy1@cps.edu](mailto:jemincy1@cps.edu)